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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

LONN BURROWS and JACKIE)	PLAINTIFF’S MOTION FOR
BURROWS,)	ENTRY OF DEFAULT
Plaintiffs,)	JUDGMENT OF LOANLEADERS
)	OF AMERICA CORP.
vs.)	
)	Case No. 2:14-CV-00544 DN-BCW
LOANLEADERS OF AMERICA CORP.,)	District Court Judge David Nuffer
Et. al.,)	
Defendants.)	Magistrate Judge Brooke C. Wells

Plaintiffs Lonn Burrows and Jackie Burrows (“Burrows”), through counsel, move this Court for entry of a default judgment as to defendant Loanleaders of America Corp. (“Loanleaders”), upon the Verified Complaint heretofore filed and served upon Loanleaders in accordance with Rule 55(b)(2), Federal Rules of Civil Procedure, and in support thereof shows the Court the following:

1. On July 25, 2014, Burrows filed in the United States District Court for the District of Utah a Verified Complaint alleging numerous violations of law in the Burrows’ mortgage transaction and subsequent foreclosure proceedings by defendants.

2. On July 29, 2014, a copy of said Verified Complaint and Summons were served upon Loanleaders, as described in the return of service filed with the Court on November 25, 2015, a copy of which is attached hereto as Exhibit A and incorporated herein by reference.

3. After twenty one days, and no Answer thereto having been served by Loanleaders upon Burrows, Loanleaders has continued to not plead or otherwise defend this action, and Burrows are entitled to judgment by default against Loanleaders.

4. Pursuant to the provisions of Rule 55(b)(2), Federal Rules of Civil Procedure, this Court is empowered to enter a default judgment against Loanleaders.

WHEREFORE, Burrows pray that this Court enter a judgment of default against Loanleaders, consistent with the attached Default Certificate filed herewith.

DATED: December 10, 2015.

Dwight J.L. Epperson Inc.

/s/Dwight Epperson

Dwight Epperson

Attorney for Plaintiffs Burrows

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of December, 2015, I caused a true and correct copy of the foregoing Motion for Entry of Default Judgment to be served via electronic filing upon counsel of record.

/s/ Dwight Epperson